

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CR. NO. 9410046-RGS
) In Open Court
 1. ANGEL GONZALEZ,) USDC Mass
 AKA "KING A-SHOT", AND) Date 7/20/04
) By Deputy Clerk 2:30pm
 2. JOSE GONZALEZ,)
 AKA "KING STRIKE", AKA)
 "TITO")

JOINT FINAL STATUS REPORT

Pursuant to Local Rule 116.5(C), the parties are hereby jointly filing the following Status Report prepared in connection with the Final Status Conference scheduled for July 20, 2004.

1. Outstanding Discovery Issues

There are no outstanding discovery motions or issues.

2. Additional Discovery

The government anticipates that, unless there is a stipulation regarding the drugs involved in this case, it will offer expert testimony regarding the drugs at issue. The defendants are not presently requesting expert discovery, but are reserving the right to seek such discovery pending disclosure of trial witnesses by the government. Other than the above, no party anticipates producing any additional discovery.

3. Insanity/ Public Authority Defenses

The defendants do not intend to raise a defense of insanity or public authority.

4. Notice of Alibi

The government requested a Notice of Alibi in its Automatic Discovery Letter. No response has been received to that request.

5. Motions

The defendants do not anticipate filing any motions to suppress, to sever or to dismiss prior to trial but are reserving their rights to file other pretrial motions that could require a ruling by the District Court.

6. Scheduling

The defendants request an additional forty five days before the case is reported to the District Court. The parties agree that this time is excludable from Speedy Trial Act calculations pursuant to 18 U.S.C. § 3161(h)(8) and will provide a proposed order to the Court.

7. Speedy Trial Act Calculations

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and agree that the following periods are excludable:

2/24/04-4/13/04 Govt's motion for detention; Order on government's motion for detention

4/21/04-6/1/04 Excluded per 4/21/04 status conference

6/1/04-7/20/04 Excluded per Order dated 6/3/04

As of July 20, 2004, 7 days will have been counted and 63 days will remain under the Speedy Trial Act.

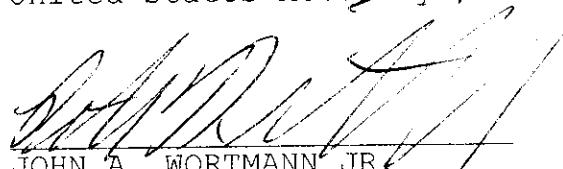
As set forth above, the parties have also agreed that an additional ⁴⁵ ~~10~~ ³⁰ days (through August 31, 2004) should be excluded in the interest of justice.

8. Length of Trial

In the event that a trial is required, the parties estimate that it will last about 4 days.

Respectfully submitted,
MICHAEL J. SULLIVAN
United States Attorneys,

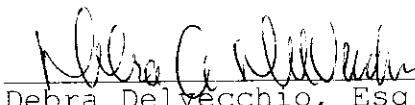
By:


JOHN A. WORTMANN JR.
PETER K. LEVITT
Assistant U.S. Attorneys
One Courthouse Way
Boston, MA
(617) 748-3355

COUNSEL FOR ANGEL GONZALEZ


Michael Bourbeau, Esq.
21 Union Street
Boston, MA 02108
(617) 722-9292

COUNSEL FOR JOSE GONZALEZ


Debra Delvecchio, Esq.
15 Front St.
Salem, MA
(978) 740-5999

July 20, 2004